

**-FILED-**

NOV 03 2020

IN THE UNITED STATES DISTRICT COURT

At  
ROBERT M. McROBB  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
Plaintiff  
vs.

Case No.

1:20CV389

Christopher E. Washington

Bristol West Insurance Group

**COMPLAINT FOR DAMAGES AND DEMAND FOR A TRIAL BY A JURY**

Comes now, the plaintiff Christopher E. Washington, (hereinafter referred to as "Washington"), and files with this Court a complaint against Defendant Bristol West Insurance Group, (hereinafter referred to as "Defendant"), as set forth below:

**1. INTRODUCTION**

1. This lawsuit involves violation(s) under the laws and regulations of Indiana Code Section, 34-51-2-5

34-51-2-6, of Comparative Negligence in Indiana Car accident case laws.

2. At all pertinent times, Washington was and remains an individual domiciled in Fort Wayne, Indiana, Allen County.

3. Washington restates and reiterates herein all previous paragraphs.

4. At all pertinent times, Bristol West Insurance Group, was and remains an Insuree provider and certified and registered to do business in Indiana with its principle place of business being located Oklahoma City, OK.

## II. JURISDICTION AND VENUE

5. Washington restates and reiterates herein all previous paragraphs.
6. This is a cause of action under Code Section, 34-51-2-3 and 34-51-2-6, of Comparative Negligence in Indiana Car accident Case Laws.

7. Defendant is liable into Washington's pursuant to the violations of Indiana Car accident cause laws. Defendant is also liable to Washington's pursuant to the laws of Indiana and possibly other states which claims may be brought under the pendent jurisdiction of this matter.

8. This honorable court has jurisdiction over this matter.

## IV. FACTUAL ALLEGATION

9. Washington restates and reiterates herein all previous paragraphs.

10. On or about October 02<sup>nd</sup>, 2020, Washington was involved in a automobile accident and the defendant refused to compensate me for all of my pain and suffering and emotional distress and to abide by Bristol West Insurance Group Company policy by compensating me for pain and suffering and emotional distress and mental anguish by not complying with me.

11. Washington received Physical Therapy from a medical professional because of the pain and suffering and emotional distress and mental anguish caused in this matter.
12. Washington reported this to the Bristol West Insurance Group Headquarters, including the Metro Human Relations Committee.
13. Washington spent numbers of hours communicating with Bristol West Insurance Group, in Oklahoma City, Ok.
14. Washington communicated with Bristol West Insurance Group by complying with sending them all Medical Records and Documentation pertaining to this case.
15. Washington was involved in a previous automobile accident where he was hit by a vehicle as a pedestrian crossing the street and was suddenly struck by the car and had to sustain an amputation of the right leg below the knee, due to an driver Carelessness act of not abiding the Traffic Speeding Limits and traffic signs and is currently suffering from a great deal of emotional distress and mental anguish, etc.,

16. Defendant Bristol West Insurance Group, failed to professionally resolve my issue before this cause of action was taken against them as described herein this complaint.

V. Count One

( Violations of Indiana Code Section 34-51-2-5, 34-51-2-6 )

17. Washington restates and reiterates herein all prior paragraphs.

18. Defendant Bristol West Insurance Group is a insurance provider that provides car insurance to customers as described in this complaint.

19. Defendant Bristol West Insurance Group, through its actions and inactions as described herein has caused great and irreparable damages to Washington.

20. Washington is hereby seeking in the sum amount of Ten (10) million Dollars.

21. The documents pertaining to this case are pertinent material.

WHEREFORE PLAINTIFF WASHINGTON PRAYS, after all due procedures are had there be judgment herein favor of the plaintiff Washington and against the Defendant Bristol West Insurance Group, for all reasonable damages sustained by the plaintiff including but not limited to compensatory damages associated with mental anguish, pain and suffering, emotional distress, embarrassment, inconvenience, frustration, fear of personal safety and security, punitive damages, attorney fees or Court Costs together with legal interest thereon from date of judicial demands until paid. FURTHER, pray for all such additional, general and equitable relief as may be necessary and proper in the premise.

**DEMAND FOR A TRIAL BY A JURY**

Pursuant to Fed.R. Civ. Proc. 38 and 15 U.S.C. and for violation(s) of Indiana Code Section 34-51-2-5 and 34-51-2-6, of Comparative Negligence in Indiana Car accident Cases Law, for not compensating me in this case and plaintiff Christopher E. Washington, hereby demands a jury trial on all issues triable to a jury.

CERTIFICATE OF SERVICE

I, hereby, certify that the undersigned have served a copy of the following foregoing by regular U.S. Postal mail and properly addressed to the parties listed below.

United States District Court  
1300 S. Hansen St.  
Fort Wayne, IN 46803

*Respectfully submitted,*  
By: Christopher E. Washington  
Christopher E. Washington

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Ashley Fulgbarn  
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Pro Se Plaintiff:

Representative for Defendant:

Date: November 3<sup>rd</sup>, 2020